



Tom
Barb-File

217/782-3397

March 15, 1984

Cook County
Film Recovery
0314400015 ✓
60007

Refer To: 03144015 - Cook County
Film Recovery System

Mr. Valdas V. Adamkus, Administrator
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Adamkus:

The Illinois Environmental Protection Agency has observed certain deficiencies during the immediate removal activities being conducted by Dombrowski and Holmes at the six facilities in the Chicago area with trailers containing contaminated film chips from the subject site. The Agency feels it is obligated to bring these deficiencies to your attention.

Members of the Illinois Environmental Protection Agency's Division of Land Pollution Control, Maywood Regional Office, have been routinely inspecting the six cyanide contaminated facilities in order to observe site security, the condition of the trailers and the general conditions at each facility.

These site inspections were made from mid November, 1983 through the end of January 1984 - during which Dombrowski and Holmes, was conducting operations meant to reduce the potential threat to public health at these sites.

A review of reports submitted after these inspections indicates that the contractor has not been diligent in the completion of this work. Deficiencies observed included contaminated film chips strewn about the areas of operations, security fences removed and not replaced, leaking trailers left "unsealed", apparent inadequate decontamination of empty trailers and the ground, and snow melt water possibly leaving a facility after contacting contaminated film chips. This last instance is one of the problems which precipitated the immediate removal action. Specific observations are included as an attachment to this letter.

Having made you aware of these deficiencies, the Agency requests that you address them with your staff and have the contractor take the necessary action to remedy the aforementioned deficiencies.



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Your assistance in having these deficiencies corrected in an expeditious manner is appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Delbert Haschemeyer".

Delbert Haschemeyer
Deputy Director
Illinois Environmental Protection Agency

DH:CG:mg

Attachment

cc: Division File
Northern Region
B. Kuykendall
R. Carlson
T. Cavanagh

ATTACHMENT

It was observed that on 12/20/83 at the J's Mobil Trailer Repair site, the contractor had neglected to empty a drum which had become full to overflowing of material leaking from one of the trailers.

It was observed on 1/11/84 at the Eagle Trailer site that film chips spilled during the transfer operations had not been cleaned up. On 1/18/84 it was observed that the fence at the east end of the Eagle Trailer site was not secure.

On 1/23/84 it was observed that film chips spilled during operations at the Rite Way Leasing facility had been covered by new snow.

On 1/26/84 film chips were observed spilled on the ground at the Livco Trailer Leasing facility at the rear of the two off loaded trailers and in the area where the roll off box/vacuum truck had been placed. Additionally, even though two contractor employees were in the process of "decontaminating" one of the off loaded trailers, they appeared to have no means of determining the adequacy of such decontamination.

On 1/31/84 at the Livco facility, fresh yellow/brown stains were observed under one of the trailers containing chips which had not been foamed. Fresh yellow stains were also observed on this date under the fronts of several of the trailers at the Rite Way facility.

On 2/3/84, it was observed that the fence at the east end of the Eagle Trailer facility was completely down. An employee of Eagle indicated to the inspector that the contractor had taken the fence down to place containers under several of the trailers and then had left the facility without replacing it. Additionally, melting snow had re-exposed the film chips spilled at this location, which were untreated and the melt water was observed to be draining to the southwest corner of the site. This was one of the original problems which precipitated the immediate removal action.

An inspection at the Red Devil facility on 2/7/84 disclosed that film chips were on the ground in the area where the contractor had been off loading trailers. The area of spillage was approximately 15 X 20 feet. It was also noted on that date that the facility access had not been restricted. Approximately 20 feet of the snow fence was down at the entry to the site.